

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

BUFFALO PATENTS, LLC, §
§
Plaintiff, §
§
v. § CIVIL ACTION NO. 6:21-cv-1065-ADA
§
ZTE CORPORATION, §
§
Defendant. §
§

**NOTICE OF SPECIAL APPEARANCE AND AGREED EXTENSION OF TIME TO
MOVE, ANSWER, OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

In accordance with the Court's standing Order signed the 11th day of August, 2021, ZTE Corporation ("ZTC") notifies the Court that Plaintiff Buffalo Patents, LLC ("Buffalo Patents") agreed to a 45-day extension of time for ZTC to answer, move, or otherwise respond to Buffalo Patents' Complaint. This request is unopposed; does not change the date for any hearing, final submission to the Court related to a hearing, or trial; and does not waive any defenses described or referred to in FED. R. CIV. P. 12.

WHEREFORE, ZTC respectfully requests the Court allow another 45 days for ZTC to answer, move, or otherwise respond to Buffalo Patents' Complaint. The undersigned specially appears for the sole purpose of seeking this unopposed extension of time for ZTC to answer, move, or otherwise respond to the Complaint.

DATED: November 5, 2021

Respectfully submitted,

/s/ Everett Upshaw

Everett Upshaw
State Bar of Texas No. 24025690
everettupshaw@upshawpllc.com
UPSHAW PLLC
1204 Gano Street
Dallas, Texas 75215
Phone: (972) 920-8000
Fax: (972) 920-8001

*Counsel for ZTE Corporation
for the limited purpose of seeking
this unopposed extension of time*

CERTIFICATE OF CONFERENCE

In telephone conversations on the 1st and 5th days of November, 2021, Zachariah S. Harrington, counsel for Buffalo Patents, advised that Buffalo Patents does not oppose the foregoing request for extension.

/s/ Everett Upshaw _____

Everett Upshaw

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of November, 2021, a true and correct copy of the foregoing was filed with the Clerk of Court using the CM/ECF system, which forwards electronic notification of such filing to all counsel of record.

/s/ Everett Upshaw _____

Everett Upshaw